



The State of New Hampshire  
*Department of Environmental Services*



Michael P. Nolin  
Commissioner

January 17, 2006

The Honorable Joseph Kenney, Chairman  
Senate Executive Department and Administration  
Room 102; LOB  
Concord, New Hampshire 03301

**RE: SB 291-FN - Relative to a Food Service Licensure for Youth Camps**

Dear Senator Kenney:

Thank you for the opportunity to comment on SB 291-FN relative to food service licensure for youth camps. This bill would require that youth camps receive a license from Department of Health and Human Services (DHHS) in addition to the license from Department of Environmental Services (DES) that is already required. DES supports this bill because it takes advantage of the expertise of DHHS in public health protection in the food service industry. Should SB 291-FN become law, DES and DHHS are committed to closely coordinate our youth camp licensing programs to make the proposed dual licensing requirements as efficient and seamless as possible for the regulated youth camps. Some background information is provided below for your information.

DES is currently the state licensing agency for New Hampshire youth camps. Licensing is performed under RSA 485-A:23, 24, 25 and 25a and the related rules, Env-Ws 1120, pertaining to the operation of youth recreation camps. Consistent with RSA 485-A:25, Env-Ws 1120 was adopted "in consultation with the department of health and human services.... relative to public health and safety issues." So there already is cooperation between DHHS and DES in the development of these rules in recognition of the diversity of issues regulated at youth camps.

"Youth camp" is defined in Env-Ws 1120.02 as an entity that: (a) represents itself as a camp; (b) is in operation for at least 10 days per license year for recreational purposes or for a combination of recreation and instruction; (c) is for-profit or under philanthropic or charitable auspices and (d) services 10 or more campers per day. There are approximately 170 licensed youth camps. The licensing period is annually from May 1 through April 30. The camp licensing fee is \$50 per camp per year. In addition to registration, DES performs at least one annual field inspection of each youth camp to evaluate compliance with the requirements of Env Ws 1120 for specific categories of camp operation including:

Personnel and staff qualifications  
Buildings, Sleeping Quarters and Equip.  
Water Supply  
Swimming Pools and Beaches  
Toilet Facilities  
Sewage Disposal Facilities  
Garbage, Waste Disposal & Chemical Storage  
Food and Food Preparation  
Milk and cream

Dishwashing  
Fire Safety  
Overnight camping  
Required Health Staffing  
Medical and Nursing Care  
Communicable Diseases - Isolation and Rep.  
Reporting of Other Illnesses  
Physical Examination Prior to Admission  
Possession and use of Epinephrine Auto-injectors and Asthma Inhalers

The Honorable Joseph Kenney, Chairman  
SB 291-FN – Relative to food service licensure for youth camps  
January 25, 2006  
Page 2 of 2

As we understand it, SB 291-FN would assign regulatory responsibility for food preparation related activities from DES to DHHS. In the context of existing DES rules, these would include: food and food preparation (Env-Ws 1120.14), milk and cream (Env-Ws 1120.15), and dishwashing (Env-Ws 1120.16), leaving other responsibilities with DES under the current program.

At DES, the youth camp program has been administered for well over 25 years by the Water Supply Engineering Bureau or its predecessor. Youth camps were originally placed in this program to take advantage of this program's staff expertise in ensuring that drinking water supplies, wastewater disposal systems and bathing beaches were safe and well operated. Since its origins, the issues of concern have evolved, expanded and become substantially more diverse than this original mission.

The DES youth camp program is staffed in the summer by three highly experienced and responsible youth camp inspectors: currently, two are active school teachers and one is a retired school teacher. These inspectors have all been with DES in this capacity from at least 5 to over 20 years and work under direct supervision of permanent DES staff. These inspectors work full time beginning in May (for the retired teacher) or June during the camp start-up period through Labor Day and have an outstanding professional relationship with the youth camp operators. Every camp is inspected unannounced at least once per summer for compliance with Env-Ws 1120. This approach to staffing and operating this program has worked very well over the years. When discovered, deficiencies run the gamut across the public health and safety categories listed in Env-Ws 1120 and are generally resolved in a timely fashion. It is worth noting that the majority of New Hampshire's youth camps work well with DES staff and are very well operated by professionals who take tremendous pride in their work as youth educators.

In conclusion, we welcome any opportunity, such as provided by SB 291-FN, to improve the public health and safety of New Hampshire's youth camps by taking advantage of the expertise available at DHHS. With DHHS, we will continue to strive to make this an efficient and effective program in partnership with New Hampshire camp directors.

Thank you again for the opportunity to comment on this legislation. If you have any questions or need additional information, please do not hesitate to call Harry Stewart at 271-3308 or me at 271-3449.

Sincerely,

  
for Michael P. Nolin  
Commissioner

cc: Senator Martel  
Senator Barnes  
Senator Roberge